

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

JANE DOE

Plaintiff

v.

MIAMI UNIVERSITY

Defendant

CASE NO. 1:16-cv-1180

COMPLAINT

1. Defendant is a state university.
2. Plaintiff Jane Doe is an individual enrolled with Defendant during the winter term 2016.
3. Plaintiff participated in one of Defendant's study abroad programs during the winter term 2016 as part of her course of study with Defendant.
4. Defendant's employees traveled with the students in the study abroad program in question during the winter term 2016 in the course and scope of their employment.
5. Defendant owed Plaintiff a duty of reasonable care to supervise the participating students.
6. During the trip, Plaintiff was exposed to a hostile environment and discrimination.
7. Plaintiff suffered physical injury and psychological and emotional distress as a result.
8. Plaintiff's injuries are a direct and proximate result of the breach of duties owed by Defendant's employees to Plaintiff.

9. Defendant is liable for the conduct of its employees in the course and scope of their employment.

10. The foregoing constitutes a breach of Defendant's obligations to Plaintiff as a student at the university.

WHEREFORE, Plaintiff requests damages suffered by Plaintiff, attorney fees and costs, and any other relief in law or in equity to which Plaintiff may be entitled.

Respectfully submitted,

/s/ Kristen M. Myers
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